Association of Tech Act Projects

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In the Matter of	)
	)
Telecommunications Relay Services	) CC Docket No. 98-67
and Speech-to-Speech Services for	)
Individuals with Hearing and Speech	)
Disabilities	)

COMMENTS OF THE ASSOCIATION OF TECH ACT PROJECTS

On behalf of the Association of Tech Act Projects, we file these comments in regard. to the FCC's Notice of Proposed Rulemaking for improvements in Telecommunications Relay Services, Docket No. 98-67. The mission of the Association of Tech Act Projects is to increase the availability and utilization of assistive technology devices and services for all individuals with disabilities. The availability and utilization of comprehensive, quality telecommunications relay services is critical to the productivity and independence of people with hearing and speech disabilities. As a result, we provide comments including recommendations that the FCC should:

1) Adopt standards that will assure quality of all relay services, especially with regard to the proposed mandate for speech-to-speech (STS) relay services.

2) Adopt standards that will assure access to emerging technologies such as voice-menu systems either through traditional relay services or through requirements by Section 255 of the telecommunication Act for product accessibility.

We thank you for the opportunity to share our comments.

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Speech-to-Speech (STS)

'We support the decision of the FCC to include speech-to-speech (STS) relay service within the range of required TRS services. Quality STS services are critical to address the needs of individuals with speech disabilities. However, because this service is substantially different in form and function from traditional relay services, we implore the FCC to provide sufficient rules to assure quality STS services. Specifically we recommend that the FCC should:

> 1. Define and describe exactly what is required of STS service providers to meet the standard of "functionally equivalent communication". Without a clear understanding of this standard, consumers will likely expect too much or too little from the STS service and program complaints will follow.

> 2. Specify and require discreet competencies for communication assistants (CA) providing STS service to assure the standard of "functionally equivalent communication" is met. The competencies required of STS communication assistants are complex and difficult to teach and test, making the assurance of quality STS services a challenge. Because of the significant possibility of communication errors when using STS communication assistants with poor skills, we believe that the FCC must establish competency standards to assure appropriate quality.

> 3. Clarify the differences between STS and traditional TRS in operational policies and procedures. STS communication assistants, in many cases, will not be able to be "invisible" transformers of information. They will instead need to be highly interactive with the individual with a speech disability to verify understanding of the content of their communication.

Traditional TRS Services

The FCC tentatively rejected proposals to establish quantitative keyboarding standards for CA's providing text/speech transliteration because it could "harm TRS users by constraining the labor pool for CA's". This clearly indicates that TRS providers are having difficulty assuring that CA's have adequate skills to assure service quality. We recommend that the FCC re-examine its position on this issue and determine a minimal level of CA competency that allows adequate communication to occur. At some point, communication errors become so significant as to cause the communication event to be completely inadequate. Regardless of labor pool issues, there should at least be a threshold of competence to assure that communication is adequate. It is interesting to not that the FCC proposes to require

competency standards for interpreters used for VRI services; "In the interest of protecting users of voluntarily-provided VRI services from the risk of communication errors caused by the use of unqualified interpreters." We recommend that the FCC do the same for users of traditional text-speech TRS services by establishing a mimimal keyboarding skill level.

Access to Enhanced Services

Access to enhanced services such as voice-menu systems is critical for individuals with. disabilities. The lack of access to these enhanced services is significant for individuals who use TRS. While we would like for the responsibility for access to these services to rest with the provider as an ADA Title II or Title III covered entity, in reality, the products needed to provide such access are not readily available. This points out the grave need for Section 255 of the Telecommunications Act to require the availability of products that will provide such access.

We recommend that the FCC re-evaluate their tentative conclusions regarding Section 255 of the Telecommunications Act and require product accessibility for enhanced services such as voice-menu systems. If the FCC maintains its position that Section 255 does not apply to enhanced services and related products such as voice-menu systems, then TRS should be required to provide such access. If accessible products are not required and the TRS does not provide access, individuals with disabilities will clearly be excluded from access to emerging technologies.